

**To:** Chris Foe[cfoe@waterboards.ca.gov]  
**From:** G Fred Lee  
**Sent:** Sat 8/8/2015 9:21:46 PM  
**Subject:** Fwd: Comments on the DISB Draft Water Quality Review  
DISB WQ Review Comments.pdf  
Evaluation Monitoring Development.pdf

fyi fred

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----- Forwarded message -----

From: **G Fred Lee** <gfredlee33@gmail.com>

Date: Sat, Aug 8, 2015 at 11:04 AM

Subject: Comments on the DISB Draft Water Quality Review

To: kelly.souza@deltacouncil.ca.gov

Cc: Anne Lee <annejlee23@sbcglobal.net>

The Delta Independent Science Board (Delta ISB) has solicited comments on a draft proposal for its review of water quality related to contaminants, nutrients, and pathogens in the Delta. In response to that request, we are submitting the attached two sets of comments based on our more than 25 years of experience in conducting and reviewing water quality studies on the Delta.

One set of comments focuses on the draft's deficiency in addressing the need for monitoring in the Central and Southern channels to evaluate current water quality conditions and, most important, how the water quality in those areas of the Delta will be altered by implementation of the so-called "Tunnel Diversion" of large amounts of Sacramento River around the Delta. We discuss that the DISB should recommend that the water quality evaluation specifically focus on the existing water quality in the Central and Southern Delta channels as potentially impacted by the proposed Delta "Tunnel Diversion" of Sacramento River around the Delta on Delta water quality. In its original draft EIS/EIR and the revised EIS/EIR the BDCP completely ignored the impact of the diversions on Central and Southern Delta water quality.

Our other set of comments discusses the approaches that should be considered for use in its water quality review, including an Evaluation Monitoring approach to evaluating the water quality significance of exceedance of a water quality criterion/standard in impacting the beneficial uses of Delta water. That approach is much more technically valid than the conventional water quality monitoring approaches used for evaluating water quality.

Questions on these issues can be directed to G. Fred Lee at [gfredlee33@gmail.com](mailto:gfredlee33@gmail.com).

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